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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company  
☒ Affects both Debtors  
*\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19 -30088 (DM)  
Chapter 11 (Lead Case) (Jointly Administered)

**DEBTORS' STATEMENT WITH RESPECT TO  
THE OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' APPLICATIONS TO RETAIN  
AND EMPLOY CATHY YANNI AS CLAIMS  
ADMINISTRATOR AND THE HON. JOHN K.  
TROTTER (RET.) AS TRUSTEE FOR THE  
FIRE VICTIM TRUST**

Related Docket Nos. 5723 and 5726

Date: March 10, 2020  
Time: 10:00 a.m. (Pacific Time)  
Place: U.S. Bankr. Court, Courtroom 17, 16th Floor  
San Francisco, CA 94102

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and debtors in  
2 possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases  
3 (the “**Chapter 11 Cases**”), hereby submit this Statement with respect to (a) the *Application of*  
4 *the Official Committee of Tort Claimants Pursuant to 11 U.S.C. § 1103 and Fed. R. Bankr. P.*  
5 *2014 and 5002 to Retain and Employ Cathy Yanni as Claims Administrator Nunc Pro Tunc to*  
6 *January 13, 2020 through the Effective Date of the Resolution Trust Agreement* [Docket No.  
7 5723] and (b) the *Application of the Official Committee of Tort Claimants Pursuant to 11 U.S.C.*  
8 *§ 1103 and Fed. R. Bankr. P. 2014 and 5002 to Retain and Employ Hon. John K. Trotter (Ret.)*  
9 *as Trustee Nunc Pro Tunc to January 13, 2020 through the Effective Date of the Resolution*  
10 *Trust Agreement* [Docket No. 5726] (collectively, the “**Retention Applications**”).<sup>1</sup>

11 The Debtors have reviewed the Retention Applications and generally do not object to  
12 the relief sought by the Tort Claimants Committee therein. The Debtors note, however, that  
13 the costs and expenses of administering a trust such as the Fire Victim Trust, including the  
14 payment of the fees, costs, and expenses of the Fire Victim Trustee and the other professionals  
15 that will be employed by the Fire Victim Trust and will be responsible for administering,  
16 settling, and resolving the Fire Victim Claims and overseeing the assets of the Fire Victim Trust,  
17 are typically borne by the trust once it is established on and after the effective date of the chapter  
18 11 plan. Nevertheless, in an effort to facilitate the administration of the Fire Victim Trust and  
19 to expedite distributions and recoveries to Fire Victim Claimants, the Debtors do not object to  
20 the payment by the estates of the fees, costs, and expenses sought in the Retention Applications  
21 during the Chapter 11 Cases until the Fire Victim Trust is established in accordance with the  
22 Plan, provided that such fees, costs, and expenses are subject to a reasonable cap and budget to  
23 be agreed upon by the Debtors.

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26 <sup>1</sup> Capitalized terms used but not herein defined have the meanings ascribed to such terms in  
27 the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization dated*  
28 *January 31, 2020* [Docket No. 5530] (together with all schedules and exhibits thereto and as  
may be modified, supplemented, or amended from time to time, the “**Plan**”).

1           WHEREFORE, the Debtors do not object to approval by the Court of the Retention  
2 Applications provided the Orders approving the same expressly provide that such fees, costs,  
3 and expenses are subject to a reasonable cap and budget to be agreed upon by the Debtors.  
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5 Dated: March 2, 2020  
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7                           **WEIL, GOTSHAL & MANGES LLP**  
8                           **KELLER BENVENUTTI KIM LLP**

9                           /s/ Stephen Karotkin  
10                          Stephen Karotkin

11                          *Attorneys for Debtors and Debtors in*  
12                          *Possession*  
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